



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

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**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

March 12, 2007

Carl Edwards, General Manager
Quebecor World Retail Printing Corporation
50 John Hancock Road
Taunton, MA 02780

Re: Notice of Violation and Reporting Requirement
Docket No. CAA-07-0012

Dear Mr. Edwards:

Enclosed is a Notice of Violation ("NOV") and a Reporting Requirement, combined in one document, issued to Quebecor World Retail Printing Corporation ("Quebecor") by the United States Environmental Protection Agency ("EPA") pursuant to Section 113 and Section 114 of the Clean Air Act. This federal administrative action pertains to Quebecor's operation of offset lithographic printing presses, and results from an EPA inspection performed at the company's Taunton, Massachusetts facility on John Hancock Road ("Facility") on July 12, 2006.

The NOV contains EPA's findings that Quebecor has violated provisions of a federally-enforceable plan approval issued by the Massachusetts Department of Environmental Protection ("MassDEP") on June 25, 2003. EPA's NOV describes violations associated with the usage of press wash at the Facility.

The EPA is further evaluating whether the Facility is in compliance with other provisions of the Clean Air Act and state and federal regulations promulgated under the Act. The regulations include the federally enforceable sections of the Massachusetts State Implementation Plan regulations at 310 CMR 7.00 et. seq.: Air Pollution Control Regulations. The Reporting Requirement requires Quebecor to submit various compliance information to EPA. The Reporting Requirement also contains a testing order that requires Quebecor to conduct emissions testing on the presses and the two thermal oxidizers.

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Quebecor may confer with EPA concerning this NOV and this Reporting Requirement, and the findings contained therein. To schedule a face-to-face conference, please have your attorney contact Tom Olivier, Senior Enforcement Counsel, at (617) 918-1737, within **seven days** of receipt of this document. Furthermore, the NOV and Reporting Requirement requires among other things that Quebecor contact William Osbahr at 617-918-8389 within **seven days** to schedule a pre-test conference. At any time, if Quebecor has technical questions regarding the Reporting Requirement, please contact Steven Calder, Environmental Engineer, at (617) 918-1744.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

Enclosures: NOV and Reporting Requirement

cc: Tom Olivier, EPA
William Osbahr, EPA
Gregg Hunt, MassDEP-SERO

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I – NEW ENGLAND**

IN THE MATTER OF:)	NOTICE OF VIOLATION AND REPORTING REQUIREMENT
)	
Quebecor World Retail Printing Corporation))	Proceeding under Sections 113
50 John Hancock Road)	and 114 of the Clean Air Act
Taunton, MA 02780)	
)	Docket No. AAA-07-0012
_____)	

I. STATUTORY AUTHORITY

1. The United States Environmental Protection Agency (“EPA”) issues this Notice of Violation (“NOV”) and this Reporting Requirement (“RR”) to Quebecor World Retail Printing Corporation (“Quebecor”) under Sections 113 and 114 of the Clean Air Act (“CAA” or “Act”), 42 U.S.C. §§ 7413 and 7414.
2. Section 113(a)(1) of the Act, 42 U.S.C. § 7413(a)(1), provides that whenever, on the basis of any information available, EPA finds that any person has violated or is in violation of any requirement or prohibition of an applicable state implementation plan (“SIP”), EPA shall notify the person of such finding.
3. The Commonwealth of Massachusetts has adopted a SIP within the meaning of Section 113(a) of the Act. The Massachusetts SIP has been approved by EPA under Section 110 of the Act, 42 U.S.C. § 7410. The Massachusetts SIP includes various federally-approved portions of the Massachusetts Air Pollution Control Regulations, 310 CMR 7.00 et. seq. (Mass APC Regulations).
4. As required by Section 113(a) of the Act, this NOV contains EPA’s findings that Quebecor has violated requirements of a permit issued under the Massachusetts SIP.

5. Section 114(a)(1) of the Clean Air Act, 42 U.S.C. §7414(a)(1), gives EPA the authority to require Quebecor to sample emissions and provide information so that EPA can determine Quebecor's compliance with the Act and its implementing regulations.
6. This RR requires Quebecor to submit information to EPA, and orders Quebecor to sample and test the emissions from its presses, pollution control equipment, and coated paper to determine compliance with the volatile organic compound ("VOC") and hazardous air pollutant ("HAP") emission limits contained in a permit issued by the Massachusetts Department of Environmental Protections ("MassDEP").
7. This NOV and this RR are not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

II. FACTUAL BASIS

8. On June 25, 2003, pursuant to 310 CMR 7.02 of the Mass APC Regulations, the MassDEP issued Quebecor a permit to modify and/or replace existing printing presses and air pollution control equipment (2003 Plan Approval).
9. Section 7.02 of the Mass APC Regulations, entitled "Plan Approval and Emission Limitations," has been approved by EPA and incorporated into the SIP.
10. The 2003 Plan Approval limits the use of press wash to 14.05 tons per year (TPY) and limits VOC emissions from the press wash to 8.49 TPY. The VOC emission limit is calculated by assuming a 40% capture efficiency and a 99% destruction efficiency. Additionally, the 2003 Plan Approval limits the monthly usage of press wash to 5,401 pounds of VOCs.
11. On July 12, 2006, EPA conducted an inspection at the 55 John Hancock Road facility in Taunton to determine compliance with Clean Air Act and the 2003 Plan Approval.

12. Based on the results of the inspection EPA determined that in 2005, Quebecor reported using 24.3 TPY press wash. The corresponding 2005 emissions of VOCs from the press wash were 14.8 TPY.

13. EPA also determined that during August 2005, Quebecor reported using 6,160 pounds of VOCs in press wash. During September 2005, Quebecor reported using 8,855 pounds of VOCs in press wash. During November 2005, Quebecor reported using 11,550 pounds of VOCs in press wash.

III. FINDINGS

14. Based on the forgoing, EPA finds that Quebecor violated the annual limits for press wash usage and VOC emissions in 2005. Accordingly, Quebecor violated Conditions C.1.e and Table B of its 2003 Plan Approval.

15. EPA finds that Quebecor violated its monthly limit for press wash usage in August, September, and November 2005. Accordingly, Quebecor violated Condition C.1.f of its 2003 Plan Approval.

IV. REPORTING REQUIREMENT

16. Within 45 days of receiving this RR, Quebecor shall submit the information described in paragraphs 17 – 20 to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
One Congress Street, Suite 1100
Boston, Massachusetts 02114
Attn: Steve Calder (SEA)

and

Gregg Hunt, Compliance and Enforcement Chief
Massachusetts Department of Environmental Protection
20 Riverside Drive
Lakeville, Massachusetts 02347

17. For each calendar month, from January 2002 through December 2006, provide the following information in electronic format (preferably an electronic spreadsheet):

- a) The amount of time each press operated (press run hours);
- b) The amount of each ink purchased. Identify the name of each ink company and product number of the ink;
- c) The amount of each ink used. For each ink:
 - i. Identify the weight percent of VOCs contained in each ink;
 - ii. Identify the weight percent of HAPs contained in the ink;
- d) The total VOC content of all the inks used and the total VOCs emitted from all the inks used;
- e) The total HAP content of all the inks used and the total HAPs emitted from all the inks used;
- f) The amount of fountain solution used, the weight percent of VOCs in the fountain solution, and the total VOCs emitted from the fountain solution;
- g) The amount of press wash used, the weight percent of VOCs in press wash, and the total VOCs emitted from the press wash;
- h) The amount of each miscellaneous chemical used, the density and weight percent of VOCs in each miscellaneous chemical and the total VOCs emitted from the miscellaneous chemicals;
- i) The amount of natural gas used by the oxidizer, heaters, and the drying ovens. Include the calculated amounts of nitrogen oxides (NO_x), VOCs, sulfur dioxide (SO₂), carbon monoxide (CO) and particulate matter (PM) emitted based on the natural gas used; and
- j) For materials used other than inks (e.g., blanket wash, fountain solution, degreasing solution) provide the amount of HAPs used and emitted. Include the weight percent of HAPs contained in each material.

18. Provide the Material Safety Data Sheets (MSDS) for each ink, press wash, fountain solution, degreasing solution, blanket wash, and miscellaneous chemicals used from January 2002 through December 2006.

19. Provide a copy of the owner's manual or other manuals that contain the technical specifications for the Rockwell C700 Press, Rockwell C500, and new Rockwell C700i.

20. Provide a list of all process equipment (e.g. presses, paper cutter machines, paper folding machines) and process support equipment (e.g. boilers, compressors) that

Quebecor has purchased since January 2002. For each piece of equipment, provide the following information (and corresponding documentation):

- a. The purpose/role of the equipment;
- b. The date the equipment was purchased;
- c. The date the equipment installation was completed;
- d. The date the equipment began operating; and
- e. The name of the manufacturer, model number, size of the equipment, production rate, and any other operational specifications of the equipment.

21. Submissions required by Paragraphs 22 through 29 shall be mailed to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
One Congress Street, Suite 1100
Boston, Massachusetts 02114
Attn: Steven Calder (SEA)

and

Bill Osbahr, Environmental Engineer
US EPA Region I
Office of Environmental Measurement and Evaluation
11 Technology Drive (Mailcode EIA)
North Chelmsford, Massachusetts 01863-2431

22. Within 7 days of receipt of this RR, contact EPA's Bill Osbahr at 617-918-8389 to schedule a pre-test conference. At the pre-test conference, EPA will review with Quebecor the various sampling, monitoring, testing, and analysis locations, procedures, and methods to be followed on the date(s) of the tests.
23. Within 60 days of receipt of this RR, prepare and mail to EPA and DEP a pre-test protocol for testing – using the appropriate methods in 40 C.F.R. Part 60, Appendix A – the destruction efficiency of the thermal oxidizer.
24. Within 60 days of receipt of this RR, prepare and mail to EPA and DEP a pre-test protocol for testing – using the appropriate methods in 40 C.F.R. Part 60, Appendix A – the capture efficiency of the presses.
25. Within 60 days of receipt of this RR, prepare and mail to EPA and DEP a pre-test protocol for testing – using the appropriate methods in 40 C.F.R. Part 60, Appendix A – the VOC content of the coated paper.
26. Within 90 days of receipt date of this RR, hold a pre-test conference with EPA, and schedule the testing date(s).
27. Within 120 days of receipt of this RR, conduct a destruction efficiency test on the thermal oxidizer, capture efficiency tests on the presses, and test the VOC content of the coated paper.
28. Within 30 days of completing each test, submit the completed test report to EPA and MassDEP.
29. Attachment A to this RR provides lists of required elements for pre-test protocols and post-test final reports.

V. ENFORCEMENT

30. At any time after thirty (30) days of the date of issuance of this NOV, EPA may issue Quebecor a compliance order, issue an administrative penalty order, and/or commence a civil judicial action for penalties and injunctive relief, regarding any of the permit violations cited above. See Sections 113(a), (b) and (d) of the Act, 42 U.S.C. §§ 7413(a), (b) and (d), and 40 CFR Part 19 (Clean Air Act judicial and administrative penalties raised from \$25,000 to \$27,500 effective January 30, 1997, then to \$32,500 effective March 16, 2004). Be advised that where EPA or another agency has notified a source of a violation, in certain circumstances the violation shall be presumed to continue for each and every day from the date of notice until the violator establishes that continuous compliance has been achieved. See Section 113(e)(2) of the Act.

31. If Quebecor does not provide the information required by the RR, EPA may order Quebecor to comply and may assess monetary penalties under Section 113 of the Act. Be advised that federal law establishes criminal penalties for providing false information to EPA.

32. Quebecor may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Quebecor. Be aware that Massachusetts may have different rules and regulations governing the protection of confidential business information.

33. The issuance of this NOV and RR does not preclude EPA from electing to pursue any other remedies or sanctions authorized by law to address the violations described herein.

VI. OPPORTUNITY TO CONFER

34. Quebecor may confer with EPA concerning this NOV and RR and the findings on which it is based. To schedule a face-to-face conference, please contact Steven Calder, Environmental Engineer at (617) 918-1744 within one week from the time Quebecor receives this NOV and this RR, or have your attorney call Thomas T. Olivier, Senior Enforcement Counsel, at (617) 918-1737.

VII. EFFECTIVE DATE

35. This NOV and this RR shall become effective immediately upon issuance by EPA.

SO ISSUED:

Susan Studlien
Susan Studlien, Director
Office of Environmental Stewardship

03/09/07
Date

ATTACHMENT A TO REPORTING REQUIREMENT FOR QUEBECOR

REQUIREMENTS FOR AIR SOURCE EMISSION TESTING

A. PRETEST INFORMATION REQUIREMENTS

In order to establish uniform requirements and help ensure that proper test methods and procedures are utilized, the information specified below must be submitted to EPA Region I - New England at least 30 days prior to the scheduled test date. In the event of any deficiencies or discrepancies in the test protocol, the company will be notified. Submission of this information will minimize the possibility of a test rejection resulting from improper sampling or data collection procedures.

Except as otherwise provided by EPA, testing shall be performed in strict accordance with procedures specified in the Code of Federal Regulations ("C.F.R."), Title 40, Part 60, Appendix A, Standards of Performance for New Stationary Sources, as amended, or in Title 40, Part 61, Appendix B, National Emission Standards for Hazardous Air Pollutants, as amended. Any variations in the sampling or analytical procedures must be indicated in the pretest information and receive written approval from EPA prior to testing.

The information to be submitted must include at a minimum:

1. Identification and a brief description of the source to be tested. The description should include:

- a. Type of industrial process or combustion facility;
- b. Type and quantity of raw and finished materials used in the process;
- c. Description of any cyclical or batch operations which would tend to produce variable emissions with time;
- d. Basic operating parameters used to regulate the process; and
- e. Rated capacity of the process.

2. A brief description of the air pollution control equipment associated with the process, including:

- f. Type of control device;
- g. Operating parameters;

- h. Rated capacity and efficiency; and
 - i. Ultimate disposal of wastes.
- 3. Type of pollutant to be sampled (particulate matter, NO_x, SO₂, hydrocarbons, etc.).
- 4. A description of the emission sampling equipment, including a schematic diagram of the sampling train.
- 5. A description of the sampling and analysis procedures. Reference standard methods, if applicable. Indicate any proposed variations with justification.
- 6. A sketch with the flow of exhaust gases from the process, through the control equipment and associated ductwork dimensions indicating to the stack.
- 7. In accordance with 40 C.F.R. Part 60, Method 1:
 - a. An elevation view of the dimensions of the stack configuration indicating the location of the sampling ports and distances to the nearest upstream and downstream flow interferences; and
 - b. A cross-sectional sketch of the stack at the sampling location with dimensions indicating the location of the sampling traverse points.
- 8. Estimated flue gas conditions at sampling location, including temperature, moisture content, and velocity pressure.
- 9. A description of the process and control equipment operating data to be collected during the sampling period.
- 10. Copies of the field data sheet forms to be used during the tests.
- 11. Names and titles of personnel who will be performing the tests.
- 12. A description of the procedures for maintaining the integrity of the samples collected, including chain of custody and quality control procedures.
- 13. Calibration sheets for the dry gas meter, orifice meter, pilot tube, and/or any other equipment that requires calibration.
- 14. A list of pre-weighed filters to be used during particulate emission testing, including identification and tare weights.

(Items No. 13 and 14 must be submitted prior to actual testing, but do not have to be included with the pretest information.)

B. EMISSION TEST REPORT REQUIREMENTS

The emission test report must contain all pertinent data concerning the tests, including a description of the process and operating conditions under which the tests were made, the results of the tests, and test procedures. While the exact format of the report will vary depending upon the type and objective of the tests, below is a suggested format containing elements that must be incorporated in the report.

1. Introduction

- a. Identification, location, and dates of tests;
- b. Purpose of tests;
- c. Brief description of source; and
- d. Name and affiliation of person in charge of tests.

2. Summary of results

- a. Operating and emission data; and
- b. Comparison with applicable emission regulations.

3. Source description

- e. Description of process including operation of emission control equipment;
- f. Flow sheet (if applicable);
- g. Type and quantity of raw and finished materials processed during the tests;
- h. Maximum normal rated capacity of the process; and
- i. Description of process instrumentation monitored during the test.

4. Sampling and analytical procedures

- a. Description of sampling train and field procedures;
- b. Description of recovery and analytical procedures;

- c. Sketch indicating sampling port locations relative to process, control equipment upstream and downstream flow disturbances; and
- d. Sketch or cross-sectional view of stack indicating traverse point locations.

5. Test results and discussion

- a. Detailed tabulation of results including process operating conditions, flue gases conditions;
- b. Discussion of significance of results relative to operating parameters and emission regulations; and
- c. Discussion of any divergences from normal sampling procedures or operating conditions which could have affected the test results.

6. Calculation and data reduction methods

- e. Description of computational methods, including equation format used to obtain final emissions results from field data; and
- f. Sample calculations from at least one run of each type of test performed.

7. Appendix

- a. Copies of all field data collected during the test, including sampling data sheets and process operating logs;
- b. Copies of all analytical laboratory data;
- c. Calculation sheets or computer input and output data;
- d. Sampling equipment and laboratory calibration data;
- e. Names and titles of personnel and organizations participating in the tests;
- f. Visible emission observations performed during the tests (if required); and
- g. Copies of all chain of custody information.